

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

TYQUAN BROWN,

Defendant.

**INDICTMENT**

S3 23 Cr. 157 (KMK)

**COUNT ONE**

(**Coercion and Enticement of a Minor**)

The Grand Jury charges:

1. From at least on or about April 2, 2022, through on or about April 3, 2022, in the Southern District of New York and elsewhere, TYQUAN BROWN, the defendant, knowingly, using a facility and means of interstate and foreign commerce, persuaded, induced, enticed, and coerced an individual who had not attained the age of 18 years to engage in prostitution and sexual activity for which a person can be charged with a criminal offense, , to wit, BROWN, by phone communications, persuaded, induced, enticed and coerced a 14-year-old minor ("Victim-1") to meet BROWN in Westchester County, New York to engage in sexual activity in violation of New York Penal Law, including New York Penal Law Sections 130.30(1) and 130.45(1).

(Title 18, United States Code, Section 2422(b).)

**COUNT TWO**

(**Coercion and Enticement of a Minor**)

The Grand Jury further charges:

2. From at least on or about April 9, 2022, through on or about April 10, 2022, in the Southern District of New York and elsewhere, TYQUAN BROWN, the defendant, knowingly, using a facility and means of interstate and foreign commerce, persuaded, induced, enticed, and coerced an individual who had not attained the age of 18 years to engage in prostitution and sexual

activity for which a person can be charged with a criminal offense, to wit, BROWN, by phone communications, persuaded, induced, enticed and coerced Victim-1 to meet BROWN in Westchester County, New York to engage in sexual activity in violation of New York Penal Law, including New York Penal Law Sections 130.30(1) and 130.45(1).

(Title 18, United States Code, Section 2422(b).)

**COUNT THREE**  
**(Sexual Exploitation of a Child)**

The Grand Jury further charges:

3. On or about December 28, 2022, in the Southern District of New York and elsewhere, TYQUAN BROWN, the defendant, employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, BROWN persuaded, induced, enticed, and coerced Victim-1 to engage in sexually explicit conduct while BROWN recorded the encounter on his cellphone.

(Title 18, United States Code, Sections 2251(a) and (e).)

**COUNT FOUR**  
**(Sex Trafficking of a Minor)**

The Grand Jury further charges:

4. In or about January 2023, in the Southern District of New York and elsewhere,

TYQUAN BROWN, the defendant, knowingly, in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, and did benefit, financially and by receiving things of value, from participation in a venture which had engaged in such acts, knowing, and in reckless disregard of the fact, that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, to wit, BROWN knowingly recruited, enticed, harbored transported, provided, obtained, and advertised an individual, Victim-1, for the purpose of engaging in a commercial sex act.

(Title 18, United States Code, Section 1591.)

**COUNT FIVE**  
**(Coercion and Enticement of a Minor)**

The Grand Jury further charges:

5. On or about January 19, 2023, in the Southern District of New York and elsewhere, TYQUAN BROWN, the defendant, knowingly, using a facility and means of interstate and foreign commerce, persuaded, induced, enticed, and coerced an individual who had not attained the age of 18 years to engage in prostitution and sexual activity for which a person can be charged with a criminal offense, to wit, BROWN, by text communications, persuaded, induced, enticed and coerced Victim-1 to meet BROWN in Westchester County, New York to engage in sexual activity in violation of New York Penal Law, including New York Penal Law Sections 130.25(4) and 130.40(2).

(Title 18, United States Code, Section 2422(b).)

**COUNT SIX**  
**(Sexual Exploitation of a Child)**

The Grand Jury further charges:

6. In or about August 2022, in the Southern District of New York and elsewhere,

TYQUAN BROWN, the defendant, employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, BROWN persuaded, induced, enticed, and coerced a 16-year-old minor ("Victim-2") to engage in sexually explicit conduct and video it, and then transmit it to BROWN via the internet.

(Title 18, United States Code, Sections 2251(a) and (e).)

#### **FORFEITURE ALLEGATION**

7. As a result of committing the offenses alleged in Counts One, Two, Three, and Five of this Indictment, TYQUAN BROWN, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 2428 and 2253, any and all property, real and personal, constituting or traceable to gross profits or other proceeds obtained from said offense and any and all property, real or personal, used or intended to be used to commit or promote the commission of said offense or traceable to such property, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

#### **SUBSTITUTE ASSET PROVISION**

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 2253 and 2428;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

[REDACTED]  
FOREPERSON

DAMIAN WILLIAMS  
United States Attorney